

THE ROSEN LAW FIRM, P.A.

Phillip Kim, Esq. (PK 9384)
pkim@rosenlegal.com
Laurence M. Rosen, Esq. (LR 5733)
lrosen@rosenlegal.com
350 Fifth Avenue, Suite 5508
New York, NY 10118
Telephone: (212) 686-1060
Fax: (212) 202-3827

Lead Counsel for Plaintiffs and Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLOS MUNOZ, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

CHINA EXPERT TECHNOLOGY, INC.,

Defendant.

)
) No.: 07-CV-10531 (AKH)
)
) **DECLARATION OF PHILLIP KIM IN**
) **SUPPORT OF LEAD PLAINTIFFS’**
) **MOTION FOR ORDER DECLARING**
) **THE PSLRA DISCOVERY STAY IS NO**
) **LONGER IN EFFECT**

)
) **BY ECF FILING**
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**DECLARATION OF PHILLIP KIM IN SUPPORT OF LEAD PLAINTIFFS’ MOTION
FOR ORDER DECLARING THE PSLRA DISCOVERY STAY IS NO LONGER IN
EFFECT**

Phillip Kim, hereby declares;

1. I am an attorney of The Rosen Law Firm P.A., Lead Counsel for the Class in this action and have personal knowledge of the facts set forth herein. I make this declaration in support of the motion of Lead Plaintiffs, CXTI Investors, for an order declaring the PSLRA discovery stay is no longer in effect. I am duly admitted to practice before this Court on this matter.

2. A complaint was filed on November 21, 2007. See Docket # 1.
3. Defendant China Expert Technology, Inc. is a Nevada corporation.
4. The complaint was served upon Defendant China Expert Technology, Inc.

by a licensed process server in Nevada on November 30, 2007.

5. China Expert Technology, Inc. accepted service. See Docket # 2.
6. The Summons was returned executed, and it was filed on December 7, 2007.

See Docket # 2.

7. The answer was due on December 20, 2007. See Docket #2.
8. Defendant never filed an answer. Defendant never filed a motion to

dismiss.

9. Notice of the Clerk's Certificate of Default as to China Expert Technology, Inc. was filed on January 22, 2008. See Docket # 3.

10. Notice of Voluntary Dismissal, without Prejudice, as to Defendants Zhu Xiaoxin, Huang Tao, and Fu Wan Chung, a/k/a Simon Fu was filed on March 17, 2008. See Docket # 17.

11. The Order appointing CXTI Investors Lead Plaintiff and The Rosen Law Firm, P.A. Lead Counsel was filed on March 25, 2008. See Docket # 18.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on March 31, 2008, at New York, New York.

/s/ Phillip Kim
Phillip Kim, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2008, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Notice was provided via First Class Mail to:

China Expert Technology, Inc.,
C/O Registered Agent
Incorp Services, Inc.
3155 East Patrick Lane, Suite 1
Las Vegas, NV 89120-3481

/s/ Phillip Kim